

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

Rony Ernesto Lopez  
Dba Rony's Place  
Susan M. Lopez  
Debtors

Case No.: 4:14-02063-JJT

Wilmington Trust, National Association,  
As Successor Trustee to Citibank, NA, As  
Trustee for Bear Stearns Asset Backed  
Securities I Trust 2006-HE3, Asset-Backed  
Certificates, Series 2006-HE3  
Movant

Chapter 13

vs.

Rony Ernesto Lopez  
Dba Rony's Place  
Susan M. Lopez  
Michael W. Robinson  
Respondents

**ANSWER OF RESPONDENTS NAMED ABOVE TO MOTION  
FOR RELIEF FROM AUTOMATIC STAY OF MOVANT NAMED ABOVE**

Respondent Debtors, by their Attorney, W. David Todd, Answers as follows:

- 1-5. Admitted.
6. Denied as to the first sentence of Paragraph 6.
7. Admitted that 11 USC 362 stays foreclosure proceedings.
8. Denied. Neither Respondents nor their Attorney have knowledge of receiving any notice of being behind in payments.
9. Denied. Now that notice has been given, Respondents, if they are indeed behind, will most likely cure the default in a timely manner
10. Respondents' undersigned Attorney grants permission to Movant's counsel to communicate with him on this matter.
11. Denied.
12. Denied.

WHEREFORE, Respondents respectfully request this Honorable Court to deny Movant's Motion in its entirety.

Respectfully submitted.

W. David Todd  
Atty ID No. 42979  
PO Box 321  
Boalsburg PA 16827  
(814) 234-2003

Date: October 23, 2017

#### CERTIFICATE OF SERVICE

I, W. David Todd, do hereby certify that I have on the date set forth below, forwarded a true and correct copy of the foregoing Answer by CM/ECF to the following:

Phelan Hallinan Diamond & Jones, LLP  
Jerome Black, Esq.  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia PA 19103

Standing Chapter 13 Trustee

W. David Todd  
Attorney for Respondents, ID No. 42979  
PO Box 321  
Boalsburg PA 16827  
(814) 234-2003  
(814) 308-8889 fax  
boalsburg@hotmail.com

October 23, 2017